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**From:** Laumann, Sara  
**Sent:** Mon 2/6/2017 7:38:05 PM  
**Subject:** Questions on General Conformity issues

Internal and Deliberative

Hi All (sending this to those on the list for the monthly OGC/ORC attorney calls)

I have a couple of questions on general conformity and wondering if you've dealt with these before. Karen Bianco and I are working on these issues here in Region 8.....

First, the Region is currently talking with BLM's Wyoming Office (& talked with BLM and the State on these issues over the years) on several topics and while it's unclear if EPA will send any written comments, if the Region decides to send a letter I thought it'd be helpful to see how other regions have addressed outstanding issues between EPA and another Federal government agency in the general conformity arena. Since we've not been able to find examples, checking to see if anyone has an example to share.

Ex. 5 - Deliberative Process

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Second, has anyone dealt with situations like any of these, and if so I'd be interested in how the Agency resolved them (or perhaps decided not to).

- **Interpretation/implementation of exemption categories.** BLM's proposed Presumed to Conform List notice (81 FR 96033) for the Upper Green River Basin Ozone Nonattainment Area includes a discussion of how BLM intends to use ten existing exemption categories the general conformity rule. **Ex. 5 - Deliberative Process**

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- **Project segmentation.** For purposes of the general conformity analysis, several categories on BLM's proposed Presumed to Conform List (81 FR 96038) allow companies subdivide prior BLM approvals into smaller projects. **Ex. 5 - Deliberative Process**

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Thanks in advance for any letters you can share and/or thoughts you may have,

-Sara

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